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Attorneys for Plaintiff
COPART INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

COPART INC.,

Plaintiff,

vs.

CRUM & FORSTER INDEMNITY
COMPANY, UNITED STATES FIRE
INSURANCE COMPANY, and DOES 1-10,
Inclusive,

Defendants.

AND RELATED COUNTERCLAIM

Case No. C 07 2684 CW-EDL

E-FILING

**REPLY DECLARATION OF ERIC K.
LARSON IN SUPPORT OF MOTION
FOR PROTECTIVE ORDER**

Date: June 17, 2008

Time: 9:00 a.m.

Place: Courtroom E

Hon. Elizabeth D. Laporte

Action Filed: March 20, 2007

Trial Date: November 10, 2008

I, Eric K. Larson, declare as follows:

1. I am an attorney at law duly admitted to practice before this Court and am an associate at Pillsbury & Levinson, LLP, attorneys of record herein for plaintiff Copart, Inc. I have personal knowledge of the facts set forth herein and could competently testify thereto.

1 2. Attached hereto as **Exhibit A** are true and correct copies of portions of the
2 transcript of the May 22, 2008 deposition of Monica Streacker, the underwriter on the subject
3 2005-2006 property policy, and a portion of Exhibit 100, bates stamped page no. POL 0298.

4 3. Attached hereto as **Exhibit B** is a true and correct copy of portions of the
5 transcript of the deposition of Michael Carson, the National Property Manager of Copart, and
6 Exhibit 72 thereto. I defended Mr. Carson in this deposition. USFIC's counsel did not
7 question Mr. Carson regarding any of the properties which USFIC seeks to inspect.

8 4. Attached hereto as **Exhibit C** is a true and correct copy of an April 10, 2008
9 email, with attachment I sent to Judith Whitehouse and her reply of the same date.

10 5. Attached hereto as **Exhibit D** is a true and correct copy of an excerpt of the
11 Construction in Progress report produced to USFIC with respect to Yard 6. It includes entries
12 in 2005, and after August 5, 2005, including a final payment for construction made on October
13 31, 2005.

14 I declare under penalty of perjury under the laws of the State of California, United
15 States of America that the foregoing is true and correct, and that this Declaration was executed
16 on June 3, 2008 in San Francisco, California.

17
18 Dated: June 3, 2008

19 /s/ Eric K. Larson
Eric K. Larson